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Biodiversity Enhancement Plan for consented redevelopment of Mountbatten House and adjacent areas, Military Road, Chatham, Medway, Kent

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1. Introduction

1.1. Site and development

Medway Development (the Client) is leading the redevelopment of Mountbatten House and adjacent areas at Military Road, Chatham, Kent, ME4 4JX ('the Site'). Mountbatten House (national grid reference TQ 7577 6801) contains the Pentagon Shopping Centre at ground level; the upper floors are being converted to residential flats. The overall Site (centroid TQ 7581 6806) includes the former bus station, part of Military Road, and an area known as 'the Corner Site'. The planning application (MC/20/3237) was consented by Medway Council, the Local Planning Authority (LPA), in April 2021 (Harris, 2021).

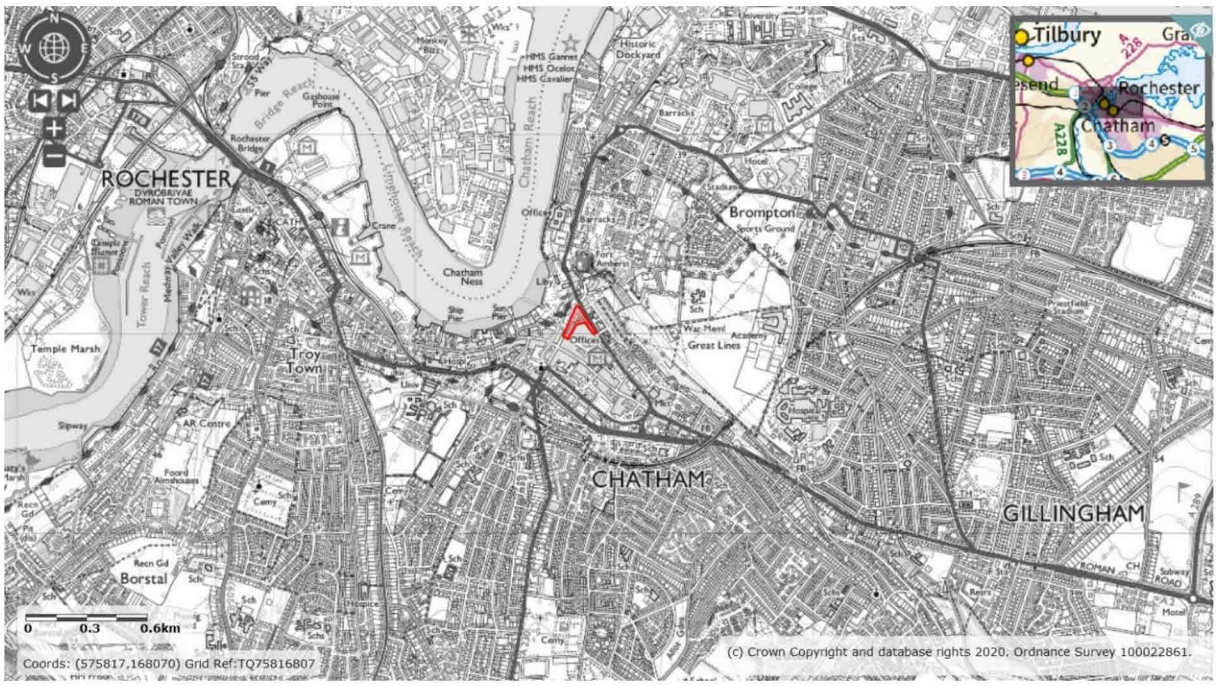

Figure 1 – Site location map from Defra online MAGIC Application.

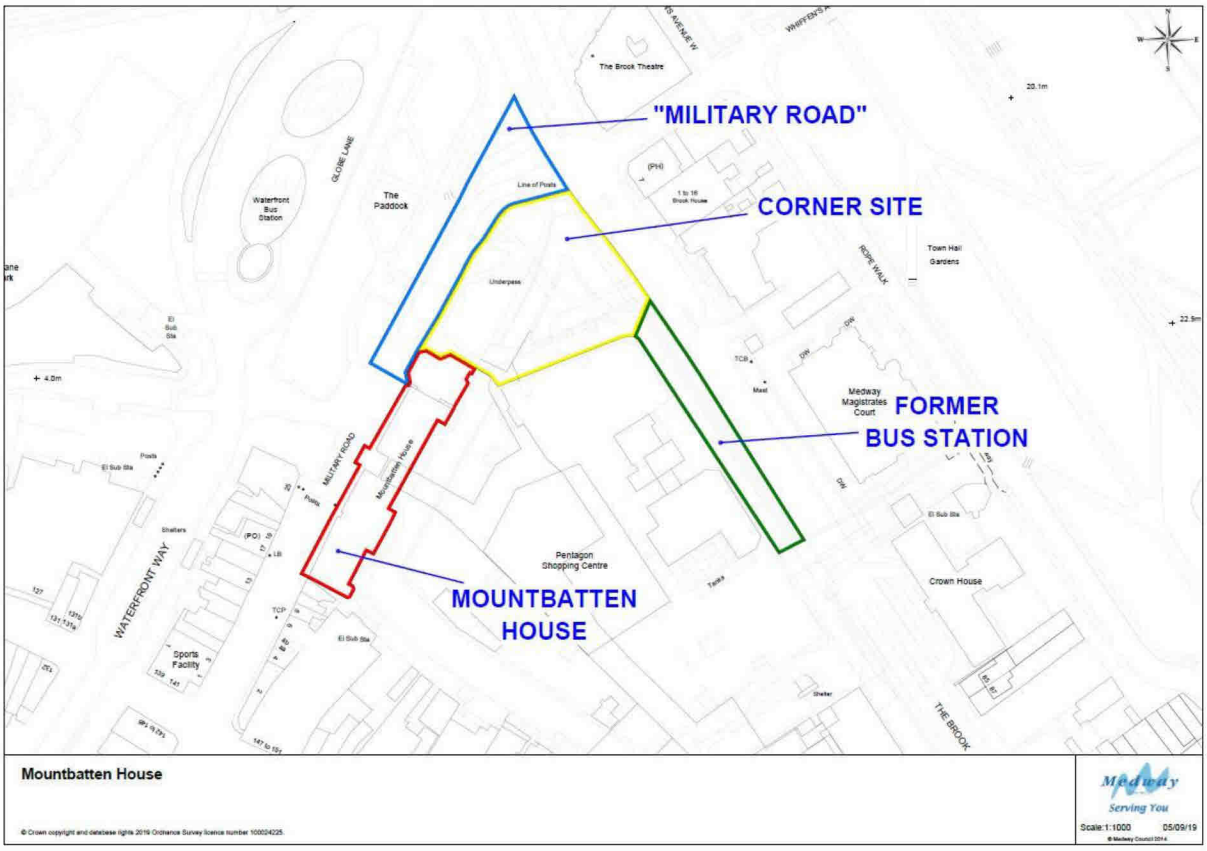

Figure 2 – Existing site layout plan provided by Client.

1.2. Ecology background

CGO conducted a Preliminary Ecological Appraisal (PEA) in September 2020, and the report (Gleed-Owen, 2020) was submitted with the planning application. The Site is largely built, comprising buildings, structures, and hardstanding; with scattered broadleaved trees, and areas of amenity grassland and introduced shrub. The existing biodiversity is low, with only 37 plant species, negligible bat roost potential, nesting feral pigeon (*Columba livia domestica*), the possibility of nesting gulls (*Larus* spp), and no other protected species.

The PEA recommended compensation of any tree and shrub loss by replacement planting, ideally with native nectar-rich and/or berry-rich species. As enhancements, it proposed a peregrine (*Falco peregrinus*) nestbox on the roof of Mountbatten House, additional ground-level native planting/seeding, and incorporation of green or brown roofs into the rooftop design.

The application was submitted before the introduction in 2024 of mandatory Biodiversity Net Gain (BNG).

A PEA was also conducted in 2021 on the adjacent 'Paddock' site between Mountbatten House and the Bus Station (Gleed-Owen, 2021a). This was followed by an aerial inspection of six trees, which showed low to negligible bat roost potential (Gleed-Owen, 2021b).

1.3. Planning conditions relating to ecology

Condition 40 of the planning consent (Harris, 2021) has the following wording:

> "Within six months of works commencing, details of how the development will enhance biodiversity will be submitted to, and approved in writing by, the local planning authority. This will include the provision of bird boxes and native species planting in any landscaping. The approved details will be implemented and thereafter retained. Reason: In order to enhance the biodiversity on the site with regard to Policy BNE39 of the Medway Local Plan 2003."

Condition 21 requires the submission of a Landscape Management Plan for landscaped areas (including rooftop public areas) for at least five years.

Condition 31 requires an external lighting plan showing the effects on landscaped areas. It does not mention bats, birds, or other wildlife specifically.

Condition 41 requires a financial contribution to compensate effects on birds at the Thames Estuary and Marshes Special Protection Area (SPA) and the Medway Estuary and Marshes SPA.

Informative 2 highlights the protection afforded to all nesting birds under Section 1 of the Wildlife and Countryside Act 1981 (as amended).

Informative 5 seeks to minimise the height of rooftop planting, due to the potential effects on the views from Fort Amherst and Great Lines Park.

Informative 6 asks for tree planting to be within soft landscaped areas (presumably rather than enclosed in paved areas or raised planters).

These are all consistent with the National Planning Policy Framework (NPPF), the latest version of which was published in December 2024 (MHCLG, 2024), and with local planning policy.

1.4. Scope and brief

This Biodiversity Enhancement Plan (BEP) was produced by CGO Ecology Ltd (CGO) for Medway Development (the Client) to discharge condition 40 of planning consent MC/20/3237 (Harris, 2021). The consent also requires certain other ecological provisions which are not directly related to condition 40. These are outside the scope of the current document.

CGO conducted a ground-level walkover of the Site on 18th March 2025, and a rooftop visit of Mountbatten House on 25th March 2025. The rooftop was accompanied by Bradley Webb of Medway Council, and a representative from Keady Construction.

Through dialogue with the Client, it was agreed that the scope of this BEP will focus on rooftop nestbox provisions for peregrine falcon and black redstart (*Phoenicurus ochruros*). Landscaping and planting aspects of the designs cannot be influenced by this document.

Ground-level landscaping plans have already been submitted, and are largely bound by public-realm aesthetic and practical constraints. Hence the recommendations in this BEP are *post-facto.* The rooftop landscaping plans are yet to be confirmed, and recommendations here may or may not be incorporated.

This BEP document is therefore subject to change if further advice is sought on landscaping and planting, especially opportunities for biodiversity enhancement.

Common name	**Species**
Annual meadow-grass	*Poa annua*
Black medick	*Medicago lupulina*
Bristly oxtongue	*Picris echioides*
Broad-leaved dock	*Rumex obtusifolius*
Buck's-horn plantain	*Plantago coronopus*
Buddleia/butterfly-bush	*Buddleja davidii*
Colt's-foot	*Tussilago farfara*
Common mallow	*Malva sylvestris*
Common ragwort	*Senecio jacobaea*
Creeping buttercup	*Ranunculus repens*
Daisy	*Bellis perennis*
Dandelion	*Taraxacum officinale* agg.
Dogwood	*Cornus sanguinea*
Dove's-foot crane's-bill	*Geranium molle*
Fat-hen	*Chenopodium album*
Fiddle dock	*Rumex pulcher*
Field maple	*Acer campestre*
Greater plantain	*Plantago major*
Guernsey fleabane	*Conyza sumatrensis*
Hornbeam	*Carpinus betulus*
Knotgrass	*Polygonum aviculare*
Norway maple	*Acer platanoides*
Oxford ragwort	*Senecio squalidus*
Perennial rye-grass	*Lolium perenne*
Perforate St John's-wort	*Hypericum perforatum*
Ribwort plantain	*Plantago lanceolata*
Shepherd's-purse	*Capsella bursa-pastoris*
Smooth hawk's-beard	*Crepis capillaris*
Sowthistle	*Sonchus* sp
Spear thistle	*Cirsium vulgare*
Spotted medick	*Medicago arabica*
Steeple-bush	*Spiraea douglasii*
Sycamore	*Acer pseudoplatanus*
Wall barley	*Hordeum murinum*
White clover	*Trifolium repens*
Wilson's honeysuckle	*Lonicera nitida*
Yarrow	*Achillea millefolium*

Table 1 – Floral list (37 species) recorded during PEA walkover (Gleed-Owen, 2020).

2. Habitats

2.1. Baseline

The Site has limited seminatural habitat value. Most land within the development red line is built (buildings and hardstanding). There are several areas of short-mown amenity grassland on site, several planted trees (some in poor condition), and a few edges with ruderals and introduced shrub exists.

A floral list gathered for the PEA (Gleed-Owen, 2024) comprised 37 species (see Table 1 above), mostly typical of an urban site. The most notable was fiddle dock, a floodplain species which appears to be declining nationally. The trees are sycamore, Norway maple, field maple, and hornbeam. No 'Schedule 9' Invasive Non-Native Species (INNS) plants were recorded, but common urban INNS are present, such as buddleia and Guernsey fleabane. The introduced shrub beside the bus station ramp comprises dogwood, steeple-bush and Wilson's honeysuckle.

The PEA (Gleed-Owen, 2024) was conducted before the introduction of mandatory BNG, and used the Phase 1 Habitat Survey system (JNCC, 2010) which was prevalent before UK Habitat Classification (UKHab Ltd, 2023) replaced it. An updated walkover on 18th March 2025 showed the areas to be 'g4 Modified grassland' in poor condition under UKHab.

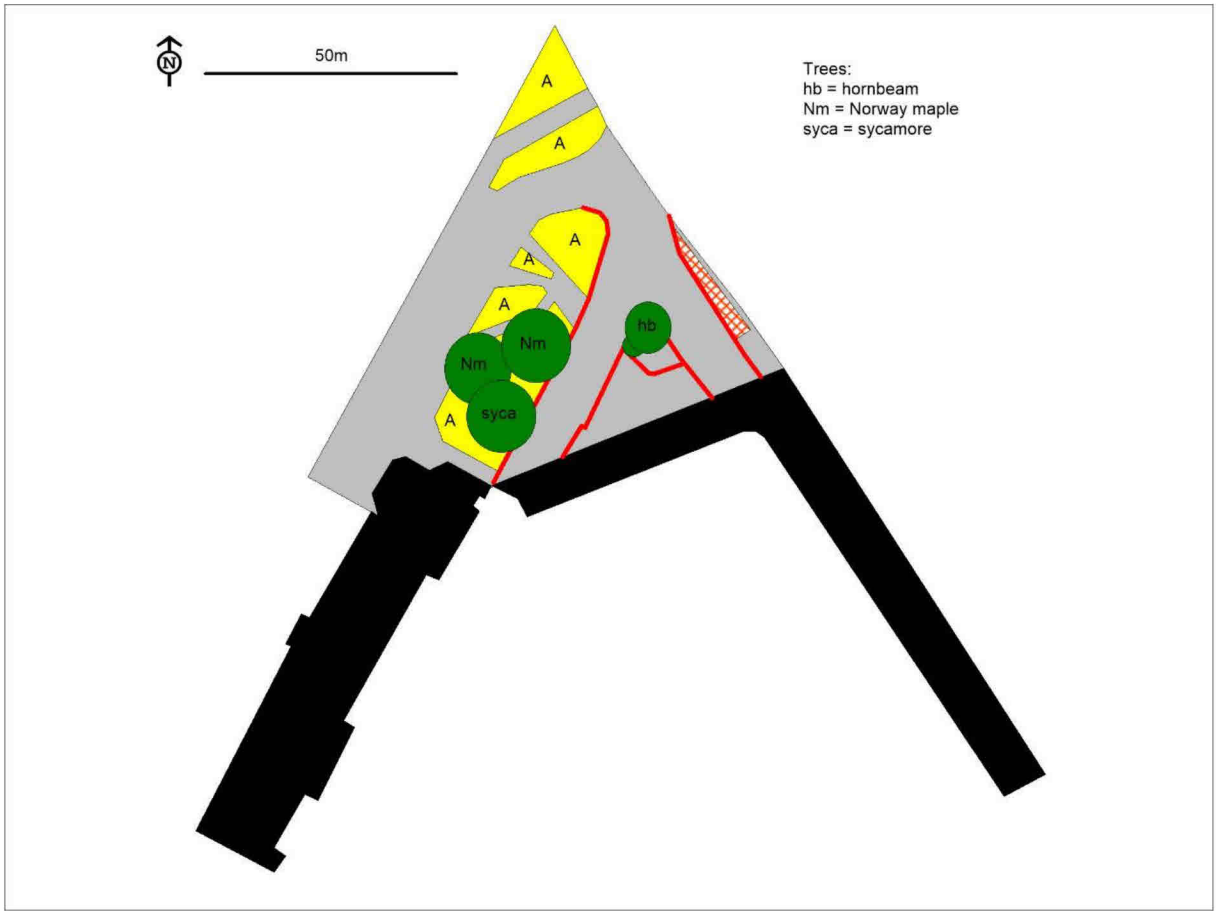

Figure 3 – Phase 1 habitat map from PEA (Gleed-Owen, 2020): buildings (black), hardstanding (grey), scattered broadleaved trees (dark green), amenity grassland (yellow, 'A'), introduced shrub (orange cross-hatching on white), wall (red line). Colour scheme after JNCC (2010).

2.2. Impact and mitigation

Most trees will be retained, but mown grassland, introduced shrub, and ruderal fringe areas will be remodelled in the new design for the public realm areas. These losses are low to negligible in biodiversity value, and will be easily offset by the planned landscaping in the consented designs.

2.3. Enhancement

The landscaping design was concluded and submitted prior to CGO's instruction to produce this BEP. Hence, no attempt will be made to change it. The species selected for planting are a mixture of native and non-native shrubs, herbs, and grasses, including berry-rich and nectar-rich species as recommended by the PEA (Gleed-Owen, 2024).

The roof area of Mountbatten House was not accessible for the PEA in 2020, but had some sparse ruderal cover when inspected in March 2025. The plans for this area not finalised, but are subject to precedence by heritage, public realm considerations, and other aspects of the design.

Hence, this BEP will not attempt to constrain the rooftop landscaping; but if the opportunity arises for enhancing the biodiversity value of the roof or green wall spaces in the consented designs, ecological input should be sought.

2.4. Management plan

The management of the public realm planted areas will be delivered by the LPA and its contractors according to the consented proposals.

Planning condition 21 (Harris, 2021) requires the submission of a Landscape Management Plan (LMP) for landscaped areas (including rooftop public areas) for at least five years. Informative 5 seeks to minimise the height of rooftop planting, due to the potential effects on the views from Fort Amherst and Great Lines Park. Informative 6 asks for tree planting to be within soft landscaped areas.

This BEP does not attempt to influence the management of planted areas, but if biodiversity enhancement is desired, ecologist advice should be sought.

3. Bats

3.1. Baseline

The PEA (Gleed-Owen, 2020) included an online search of the Defra MAGIC Application. This showed that Natural England has issued very few European Protected Species (EPS) mitigation licences in the Medway area. Three licences have been issued for bats at sites 6km to the east, south and west. Collectively these were for brown long-eared bat (*Plecotus auritus*), common pipistrelle (*Pipistrellus pipistrellus*), and soprano pipistrelle (*Pipistrellus pygmaeus*).

The PEA concluded that the urban nature of the Site, its paucity of trees, and its limited greenspace, make the presence of bats unlikely. Ecology surveys on the adjacent Paddock site (Gleed-Owen, 2021a,b) made the same conclusion.

3.2. Impact and mitigation

It is not likely that any bats forage, commute, or roost on Site, therefore there will be no impacts. No mitigation or compensation is needed with respect to bats. Planning condition 31 (Harris, 2021) requires an external lighting plan, but does not mention bats specifically.

3.3. Enhancement

No enhancements are recommended. Even if occasional bats pass through the Site, it would not warrant provision of a batbox. A batbox is unlikely to be used, and would present a disproportionate liability for the management of the Site.

3.4. Management plan

No management plan for bats is needed.

4. Birds

4.1. Baseline

The PEA (Gleed-Owen, 2020) recorded feral pigeon on Site, and this species was known to nest in Mountbatten House prior to exclusion measures were put in place in early 2025. Herring gull (*Larus argentatus*), great black-backed gull (*Larus marinus*), and lesser black-backed gull (*Larus fuscus*) could nest on the roof of Mountbatten House in the spring and summer months.

The Paddock PEA (Gleed-Owen, 2021a) recorded the following additional species from the adjacent site: wood pigeon (*Columba palumbus*), goldfinch (*Carduelis carduelis*), and two raven (*Corvus corax*) overhead.

Other species which could be expected to roost and/or nest on Mountbatten House include jackdaw (*Corvus monedula*) and starling (*Sturnus vulgaris*).

The Medway Estuary and Marshes Special Protection Area (SPA) is 5.6km to the northeast; the Thames Estuary and Marshes SPA is further away.

4.2. Impact and mitigation

The exclusion of feral pigeon from nesting within Mountbatten House is a net loss of nesting and roosting habitat for the species. However, this is not a Priority Species.

All nesting birds and their active nests are protected by Section 1 of the Wildlife and Countryside Act 1981 (as amended), and the construction process must take appropriate precautions. Planning informative 2 (Harris, 2021) highlights the protection afforded to all nesting birds.

4.3. Enhancement

4.3.1. Peregrine Falcon Nestbox

Significant enhancement is proposed in the form of a peregrine nestbox on the roof of Mountbatten House. Peregrine falcon is ‘green’ in the fifth Birds of Conservation Concern (BoCC5) assessment (Stanbury *et al,* 2021), but is a welcome addition to any urban fauna. Peregrines feed on urban birds, especially feral pigeons.

During the rooftop visit on 25th March 2025, a suitable location was identified at the northeast corner of the Mountbatten House roof, inside the parapet. This location is the area least likely to be disturbed by maintenance, public access, or other human activities. The Client agreed that the most robust solution, a concrete box such as the ‘Schwegler Peregrine Falcon Nest Box’ (see Figure 4), would be preferred.

It will be installed under ecologist supervision once all works have been completed on the roof. Ideally, the timing would be optimised for the nestbox to be discovered by peregrines prior to their nesting season begins in March.

The standard fixing mechanism is via a metal frame which can be attached to the outside of a building, high on a north- or east-facing elevation. The box weighs 260kg, so this is a significant consideration on a public site. It was agreed that the box would be installed within the rooftop parapet, therefore it would not require the standard metal frame. This should be specified at the time of purchase.

See Figure 6 for recommended location. Exact location and fixing details must be agreed with an ecologist on Site.

A monitoring camera is also recommended, and the Client is amenable. This allows live-streaming of nesting peregrines via website or other means, for conservation monitoring, as an educational resource, and for general public interest. Ecologist advice will be required to select a suitable model and location that will avoid disturbance to nesting peregrines.

Figure 4 – Schwegler Peregrine Falcon Nest Box.

Figure 5 – Schwegler 1HE Brick Box, suitable for black redstart.

4.3.2. Black Redstart Nestboxes

Black redstart is classified as 'red' (the highest threat status) in BoCC5, and is an important species to target in nestbox provision. It nests readily on urban rooftops. A model such as the Schwegler 1HE Brick Box (see Figure 5) is recommended, to be installed in two undisturbed locations at the north and south ends of the Mountbatten House rooftop.

This model is designed for integration into the fabric of an upper brick-built elevation, but can be fixed or simply placed on a rooftop location. It weighs 2.6kg. Indicative locations are shown on Figure 6, but exact locations and fixings must be agreed with an ecologist.

Black redstart may not use one or both nestboxes if nesting peregrines are present. Nevertheless, black redstart could nest there until peregrines occupy the peregrine nestbox, and would be an important enhancement even if peregrines do not nest.

The roof is around 100m in length, which is sufficient to accommodate two separate black redstart boxes. The southernmost location may still be used by black redstart even if peregrines occupy their box at the other end of the roof.

Figure 6 – Recommended nestbox locations on the roof of Mountbatten House. Exact locations to be confirmed, and installation must be supervised by an ecologist. Aerial imagery from MAGIC Map.

Gulls may also nest on the rooftop, in the open, regardless of planned provisions. Although gulls are often seen as a nuisance, it should be noted that all three large urban gulls are threatened species in the UK. In the 'BoCC5a' seabird addendum (Stanbury *et al,* 2024), herring gull and great black-backed gull are classified 'red', and lesser black-backed gull is 'amber'.

4.4. Management plan

The bird nestboxes can be left unmanaged, and should not be disturbed. A permanent live-streaming camera is recommended next to the peregrine nestbox. This should not be disturbed during the spring and summer months when peregrines are breeding. Nesting begins in March, and the young may fledge in June, but may not leave until August.

A more detailed management plan is recommended once the nestboxes are installed. It is imperative that the sensitive nature of these enhancements is properly communicated to all persons and organisations that could access the rooftop.

5. References

Gleed-Owen, C. (2020) *Preliminary Ecological Appraisal of Mountbatten House, former bus station, corner site and part of Military Road, Chatham, Medway, Kent*. CGO Ecology Ltd, Christchurch. Report for Medway Development.

Gleed-Owen, C. (2021a) *Preliminary Ecological Appraisal and bat Potential Roost Assessment at The Paddock Open Space, Military Road, Chatham, Kent*. CGO Ecology Ltd, Christchurch. Report for Medway Development.

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Stanbury, A., Burns, F., Aebischer, N.J., Baker, H., Balmer, D.E., Brown, A., Dunn, T., Lindley, P., Murphy, M., Noble, D.G., Owens, R. & Quinn, L. (2024) The status of the UK's breeding seabirds: an addendum to the fifth Birds of Conservation Concern in the United Kingdom, Channel Islands and Isle of Man and second IUCN Red List assessment of extinction risk for Great Britain. *British Birds*, 117, 471–487.

6. Photographs

Plate 1 – Recommended peregrine nestbox location.

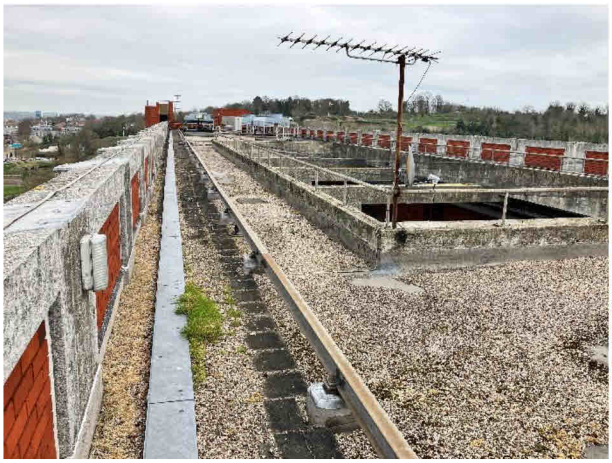

Plate 2 – View from south to north along rooftop.

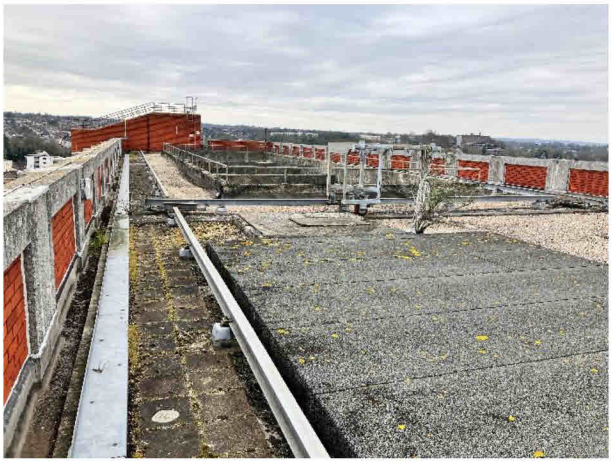

Plate 3 – View from north to south along rooftop.

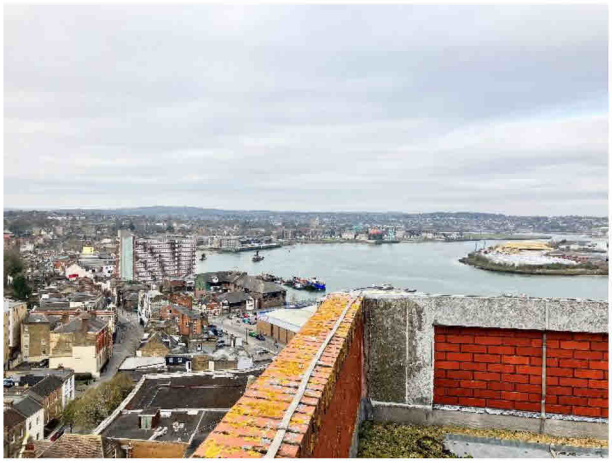

Plate 4 – View over River Medway to the west.

Plate 5 – View over Bus Station below.

Plate 6 – View east over Chatham.